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July 15, 2015

Haley C. Lewis
Program Manager
GASP
732 Montgomery Highway #405
Birmingham, AL 35216

Subject: GASP Comments on Alabama's 2015 Ambient Air Monitoring Plan

Dear Ms. Lewis:

Thank you for your interest and participation in the public review of the 2015 Ambient Air Monitoring Plan. We received your comments by email on July 2, 2015. This plan is a consolidation of the network evaluations performed by ADEM and the two local air quality agencies in Alabama, the Jefferson County Department of Health and the Huntsville Division of Natural Resources and Environmental Management. ADEM prepared the responses which refer to areas outside Jefferson County and the Jefferson County Department of Health wrote the responses relevant to its jurisdiction:

Section II, B. "As proposals to the NAAQS strengthen standards, Alabama should be planning to implement more, not less monitoring."

EPA rules presently require a minimum of two ozone monitors for the Jefferson/Shelby County area. ADEM and JCDH collectively operate eight ozone monitors in the two-county area. Therefore, the Birmingham area has an ozone monitoring network which far surpasses EPA requirements for the area. Your request for additional ozone monitors in the State must be weighed against the well known budgetary woes the State of Alabama presently faces. The Department has limited resources to fund air quality monitoring efforts.

Section III, A. 1. "The Mobile MSA will go from having a monitoring site for PM10 to no longer having a site that monitors PM10"

ADEM has historically monitored PM_{10} in the Mobile area at many locations. The objective of these monitors was to characterize the air quality in neighborhoods and to locate and monitor the highest concentration in the area. As concentrations have decreased over time, so has the need for PM_{10} monitors. Discontinuing these monitors allows ADEM to concentrate its limited resources on fine particle monitoring ($PM_{2.5}$). The WKRG site historically has shown the highest concentration of PM_{10} for the area, yet this site has recently reported levels that are well below the PM_{10} NAAQS. Also, the infrastructure at the site was in need of significant repair to keep it safe and to meet the appropriate siting

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criteria. For these reasons, ADEM discontinued monitoring at this site. EPA rules do not require any PM_{10} monitors for the Mobile area.

Data from the PM_{10} Mobile monitor is shown below:

Year	Highest Daily Reading ($\mu g/m^{3)}$	percent of NAAQS (Max value/150 $\mu g/m^3$)*100)
2010	76	51%
2011	59	39%
2012	42	28%
2013	45	30%

Section III, A. 2. "A Monitor should be installed in Pelham to account for primary PM and evenly distribute monitoring geographically throughout the Birmingham-Hoover MSA"

ADEM lost access to the building where the Pelham $PM_{2.5}$ monitor was located by demand of the owner. ADEM was unable to find an acceptable site at that location or in the immediate vicinity; therefore, the site was closed in June 2015. After a thorough review of the network in the Birmingham MSA, ADEM found that this monitor had the lowest readings in the area. The area is required by EPA to have a minimum of three $PM_{2.5}$ monitors. The area presently has five $PM_{2.5}$ monitors, not including the Pelham site. Therefore, without the Pelham monitor, the Birmingham MSA will still easily meet EPA's monitoring requirements. The $PM_{2.5}$ monitor was placed in Pelham primarily to evaluate air quality downwind of the large central business district of Birmingham, and secondarily to include local $PM_{2.5}$ sources. The site has been operational since 1999 and was reporting concentrations well below the NAAQS. For these reasons, ADEM will not continue to operate a monitor in this area. The Jefferson County Department of Health will continue to operate a robust network of monitors that will be adequate to characterize $PM_{2.5}$ levels in the Birmingham MSA, including a continuous $PM_{2.5}$ monitor at the nearby Hoover site.

Section III, B. 1. "Where the mineral wool piles (MWPs) still have not been removed, it would be imprudent for JCDH to discontinue monitoring for CO at the Sloss Shuttlesworth monitor"

The commenter is under the impression that Walter Coke's Fiber Division (Mineral Wool Plant) shutdown in 1999, however this is incorrect. The Mineral Wool Plant, across from the Shuttlesworth monitor, operated up until the morning of December 11, 2009. The primary source of CO and the reason for the CO monitor was the melting process at the Mineral Wool Plant. The Department placed the monitor at the fence-line for the purpose of determining what the level of CO was and using it as enforcement tool. The JCDH wrote subsequent NOVs in 1999 and 2008 as a result of CO levels attributed to the Mineral

Wool Plant's melting process. As JCDH's 2012 Air Quality Report[1] shows on page 13, the CO has dropped dramatically since the shutdown of Walter Coke's Fiber Division and the levels measured now are comparable to North Birmingham and both are well below the NAAQS for CO. It is unclear if the commenter attributes CO to the mineral wool piles, if so this is incorrect. CO or Carbon Monoxide is produced from the combustion of fossil fuels. Regardless of the make-up of the MWP, the pollutant would be in particulate form if the MWP became wind-blown and would be quite coarse in size (PM_{10}) and greater. Please note that any plans to remove the MWP would have to be approved by the Department to ensure that fugitive dust does not cross property lines.

Section III, B. 2. "Where the EPA is still acting under its CERCLA authority at the 35th Avenue Site and the Sloss Shuttlesworth monitor collected data for only two years, JCDH should continue monitoring for $PM_{2.5}$ at this site."

The EPA's CERCLA action is related to soil contamination and the JCDH and the EPA have monitored for air toxics around the community. The JCDH elected to monitor for $PM_{2.5}$ to address the JCDH's and ATSDR's concerns. JCDH does not have any data to suggest that EPA's CERCLA actions have any correlation to the monitored pollutants at the Shuttlesworth site nor is it within the scope of this monitoring plan to do so. Special considerations for CERCLA actions should be addressed to the EPA.

The $PM_{2.5}$ data collected at the Shuttlesworth site continuously spanned approximately 12 months between the middle of 2013 and the middle of 2014. Therefore, there was not 2 full years of data collected at this site. The $PM_{2.5}$ data that was sampled at the Shuttlesworth site was compared to the $PM_{2.5}$ sampled at the North Birmingham monitoring site during the same time period and it was concluded that the monitors were comparable and there was no need to continue to monitor for $PM_{2.5}$ at this time. Please note this plan does not preclude JCDH from conducting further studies.

It should be noted that JCDH will continue to monitor the criteria pollutant PM_{10} at the Shuttlesworth site.

I hope that this has addressed your concerns.

Sincerely,

Ronald W. Gore, Chief
Air Division

RWG/CH/bdc

[1] http://www.jcdh.org/misc/ViewBLOB.aspx?BLOBId=687